

EXHIBIT 1

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION**

IN RE AUTOMOTIVE PARTS
ANTITRUST LITIGATION

:
: Master File No. 12-md-02311
: Honorable Marianne O. Battani

[PART]

: Case No.
:
:

THIS DOCUMENT RELATES TO:
END-PAYOR ACTIONS

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**END-PAYOR PLAINTIFFS' FIRST SET OF INTERROGATORIES
TO [DEFENDANT]**

Pursuant to Rules 26 and 33 of the Federal Rules of Civil Procedure, Plaintiffs, through their counsel, request that [Defendant] respond to the following interrogatory within (30) days of service and thereafter supplement such interrogatory response as may be necessary to comply with the requirements of Rule 26(e) of the Federal Rules of Civil Procedure.

DEFINITIONS

The following Definitions apply to these Interrogatories:

1. "Each" includes "all" and "any."
2. "Make" means motor vehicle original equipment manufacturer ("OEM").

3. “Model Name” means a particular brand of motor vehicle sold under a make by an OEM.

4. “Model Number” means an alphabetical and/or numerical code used in reference to a particular brand of motor vehicle during the research and development phase.

5. “Model Platform” refers to motor vehicle models of the same model year or different model years that share common design, engineering, production, and/or manufacturing characteristics, including but not limited to, identical automotive parts at the component or sub-component level.

6. “Model Year” refers to the first year that a motor vehicle model is officially available for purchase in a specific market. Note that some models may be unofficially available for purchase in specific markets before their model year.

7. The use of the singular herein also includes the plural, the masculine, and the feminine, as appropriate in the context. The use of any tense of any verb shall include also within its meaning all other tenses of the verb.

INSTRUCTIONS

1. If a response to the interrogatory, or part thereof, is withheld on a claim of privilege, identify the privilege asserted and state in detail sufficient facts to establish the basis for the privilege. State whether the information requested has ever been provided to any governmental entity or any other

party other than Defendant or its attorneys.

2. If any information requested is withheld based on a claim that such information constitutes attorney work-product, please provide all the information described in Instruction No. 1 and identify the litigation in connection with which the information was obtained and/or prepared.

3. The obligation to respond to this interrogatory is continuing pursuant to Rule 26(e) of the Federal Rules of Civil Procedure. If at any time after responding to this interrogatory you discover additional information that will make your response to this interrogatory more complete or correct, supplement or amend your responses in accordance with the Rule.

4. If you respond to the interrogatory by reference to business records pursuant to Federal Rule of Civil Procedure 33(d), identify such records by Bates number and the name of the employee certifying the documents as business records for purposes of answering the interrogatory.

INTERROGATORIES

INTERROGATORY NO. 1:

Identify each vehicle model, including but not limited to Make, Model Name, Model Number, Model Platform, and Model Year, affected by the collusion or coordination described in your plea agreement with the Antitrust Division of the United States Department of Justice (Ex. 1).

RESPONSE:

Date: October 10, 2014

Respectfully submitted,

/s/ Steven N. Williams

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CERTIFICATE OF SERVICE

I, Steven N. Williams, hereby certify that I caused a true and correct copy of the **END-PAYOR PLAINTIFFS' FIRST SET OF INTERROGATORIES TO ALL DEFENDANTS** to be served via e-mail upon all registered counsel of record via the Court's CM/ECF system on October 10, 2014.

/s/ Steven N. Williams

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